

**AFFIDAVIT OF SPECIAL AGENT DOMINIC GROSS  
IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Dominic Gross, being duly sworn, state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been a Special Agent of the Federal Bureau of Investigation ("FBI") since July 2015. I am currently assigned to the Economic Crimes Squad in the FBI's Boston Field Office, where I investigate possible violations of federal law, including wire fraud, bank fraud, money laundering, intellectual property rights violations, bankruptcy fraud, and mortgage fraud. I have received on-the-job training as well as FBI-sponsored training related to these types of investigations, and I have participated in the execution of search, seizure, and arrest warrants related to criminal investigations. My investigations and training have included the use of surveillance techniques, confidential informants, and court-authorized interception of wire and electronic communications.

2. As an FBI Special Agent, I am empowered by law to investigate violations of the laws of the United States, and I am a law enforcement officer with authority to execute arrest and search warrants issued under authority of the United States.

3. I am currently conducting an investigation of CARLYANN AMOS ("AMOS") and others for violations of certain federal laws, including bank fraud, wire fraud, money laundering, and aggravated identity theft.

4. I make this affidavit in support of a criminal complaint charging AMOS with conspiracy to commit bank fraud, in violation of 18 U.S.C. §1349. Specifically, as set forth below, I have probable cause to believe that AMOS conspired with others to execute a scheme to fraudulently obtain money under the custody and control of Santander Bank, N.A. ("Santander Bank"), a financial institution as defined in 18 U.S.C. §20.

5. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is probable cause for the requested criminal complaint and does not set forth all of my knowledge about this matter.

6. With respect to the transactions described below, I have reviewed the referenced bank surveillance photos, as well as the Santander Bank records concerning each of the transactions.

**PROBABLE CAUSE TO BELIEVE THAT A FEDERAL  
CRIME WAS COMMITTED BY AMOS**

7. AMOS is currently a resident of Randolph, Massachusetts.

8. On or about December 30, 2017, an unidentified man, Co-conspirator 1 (“CC-1”) entered a Santander Bank branch located at 51 Pleasant Street in Weymouth, Massachusetts, where AMOS was then employed as a teller. CC-1 approached AMOS and, according to AMOS, identified himself as a Santander Bank customer and produced a fraudulent ID in the customer’s name, hereinafter referred to as “Victim 1.” AMOS was aware at the time that CC-1 was not, in fact, Victim 1.

9. CC-1 requested two official bank checks – one for \$230,000 and a second for \$120,000 – drawn on two of Victim-1’s Home Equity Line of Credit (“HELOC”) accounts at Santander Bank, accounts ending in 1057 (“SANT-1057”) and 8717 (“SANT-8717”). CC-1 also requested a cash withdrawal of \$9,000 from the SANT-1057 account. AMOS facilitated the processing of both official checks and the cash withdrawal. After completing these fraudulent transactions, CC-1 took the checks and the cash and departed the branch.

10. Victim 1's husband and co-account holder was interviewed by FBI agents and confirmed that neither he nor his wife had authorized anyone to withdraw the funds described above, nor had either ever been to the bank branch where the transactions took place.

11. As a further part of the scheme, on or about January 13, 2018, a second unidentified man, Co-Conspirator 1 ("CC-2") entered the same Santander Bank branch located at 51 Pleasant Street in Weymouth, Massachusetts. CC-2 approached AMOS and, according to AMOS, identified himself as a Santander Bank customer, hereinafter referred to as "Victim 2." AMOS was aware at the time that CC-~~2~~<sup>2</sup> was not, in fact, Victim ~~2~~<sup>2</sup>. CC-2 requested two official bank checks – one for \$280,000 and a second for \$167,325 – drawn on Victim-2's Home Equity Line of Credit ("HELOC") account at Santander Bank, account ending in 4111 ("SANT-4111"). CC-2 also requested a cash withdrawal of \$9,000 from the SANT-4111 account. AMOS facilitated the processing of both official checks and the cash withdrawal. After completing these fraudulent transactions, CC-2 took the checks and the cash and departed the branch.

12. Victim 2 was interviewed and confirmed that the transactions in his account were fraudulent, and that he had not authorized anyone to withdraw the funds.

13. On February 1, 2018, a Boston Police Detective and I interviewed AMOS at a Santander Bank branch in Quincy, Massachusetts, concerning the above transactions. During the interview, AMOS admitted that she had knowingly facilitated the fraudulent withdrawals from Victim 1's SANT-1057 and SANT-8717 accounts, as well as Victim 2's SANT-4111 account. AMOS admitted that she had known what she was doing was wrong, and knew she risked getting caught by the bank or law enforcement.

14. AMOS told us that she had been recruited by an acquaintance of hers, Co-conspirator 3 ("CC-3"), to facilitate the withdrawals, and that CC-3 introduced her to another

individual, Co-conspirator 4 ("CC-4"), with whom she usually communicated via FaceTime. CC-4 told AMOS that the person who would be requesting her help to obtain the bank checks would be using an out-of-state form of identification, and that CC-4 did not want people asking questions. After the first transactions took place in Victim 1's account, CC-4 told AMOS that she would receive \$5,000 per set of transactions. AMOS said that, during the week after the second transactions took place on January 13, 2017, she received \$2,000 from CC-3 for her participation in facilitating the transactions. AMOS advised that she did not receive any other funds or compensation.

### CONCLUSION

15. Based on my knowledge, training, and experience, and the facts set forth in this affidavit, I respectfully submit that there is probable cause to believe that AMOS conspired to commit bank fraud, in violation of Title 18, United States Code, Section 1349.

Respectfully submitted,



Dominic Gross  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me  
on July 8, 2019



DAVID H. HENNESSY

United States Magistrate Judge

